

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

DATABASEUSA.COM LLC,  
a Nevada Limited Liability Company  
with its principal place of business  
in the State of Nebraska,

Plaintiff,

v.

THE SPAMHAUS PROJECT, a  
company limited by guarantee and  
organized under the laws of England,  
aka THE SPAMHAUS PROJECT LTD,

Defendant.

CASE NO.: 8:19-cv-423

**PLAINTIFF'S MOTION FOR  
EXTENSION OF TIME TO RESPOND**

COMES NOW Plaintiff Databaseusa.com LLC ("Database") and requests additional time to submit a Response or additional evidence pursuant to this Court's May 5, 2020 Memorandum and Order (the "Order"). [Doc. 29.] In support of its motion, Database states as follows:

1. This Court's Order denied Database's request for injunctive relief, but gave Database an additional thirty (30) days to provide additional evidence in support of a damage calculation.
2. Thirty days from the Court's May 5, 2020 order places Database's deadline to submit more evidence as June 5, 2020.
3. Database is working diligently on its response, but an additional thirty (30) days to file a response to the Court's Order is needed to ensure the accuracy of Database's additional submission.

4. Database initially filed this action on September 25, 2019 and this action has only been pending for a short amount of time. Since the filing of this case, the outbreak of the Covid-19 pandemic has worsened significantly.
5. Because the Defendant has not responded and Plaintiff is only seeking a default judgment, no prejudice would result from a short extension of thirty (30) days to respond to this Court's Order.
6. This extension would result in Plaintiff's deadline to respond being extended from Friday, June 5, 2020 to Monday, July 6, 2020.
7. This request is not being made in an attempt to unduly delay this proceeding and a short extension of thirty (30) would not delay this action extensively.

DATED this 29<sup>th</sup> day of May, 2020.

DATABASEUSA.COM LLC,  
Plaintiff

BY: /s/ Robert S. Sherrets  
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